

### **REMARKS**

Claims 1-25 remain pending in this application with claims 15-22 and 25 being withdrawn from consideration. Claims 1, 3, 14, 23 and 24 have been amended to clarify the present claimed invention by this response. Support for the amendments can be found throughout the specification, and more specifically on page 7, lines 15-25 and page 8, lines 20-27. Thus, it is respectfully submitted that no new matter is added by these amendments.

#### **Objections to the Claims**

Claims 2, 3, 14 and 23 – 24 are objected to because of the informalities identified on page 2 of the Rejection. These claims have been formally amended in accordance with the Examiner's suggestion. Therefore, Applicant respectfully requests that this objection be withdrawn.

#### **Rejection of claims 1-14 and 23-24 under 35 U.S.C. 102(e)**

Claims 1-14 and 23-24 are rejected under 35 U.S.C. 102(e) as being anticipated by Torres (U.S. Publication No. 2004/0088313; hereinafter "Torres").

The present claimed invention provides a system enabling a user of an application object including an executable portion of an executable application to access documents external to the application. The system includes a map associating a set of access links with (a) an application object identifier identifying computer executable code comprising a separable portion of a larger executable application and (b) an organization identifier identifying an organization. The set of access links support access to documents external to the application. A link processor is included for initiating provision of data and the data representing a set of access links to a user in response to a received organization identifier and a received application object identifier. A command processor is also included for initiating access to an external document using a link in the set of access links in response to user command.

Torres describes a method and a system for a knowledge management and archival system on a network. A document to be archived is processed to be machine readable and loaded to a database. The document can be text, image, video or audio, all of which are indexed during and/or after uploading, and stored to the database. This knowledge management system comprises a server for uploading a record, a user terminal for creating a plurality of indices for each uploaded record, and a search engine

for locating records in response to an index sensitive inquiry. The knowledge management system can also include indexes, such as a field index, a native index and a content index. The knowledge management system also comprises a system administration utility, a data loading component and database management utilities (see Abstract).

The Office Action contends that Torres discloses or suggests each and every feature of the present claimed invention. Applicant respectfully disagrees. Contrary to the assertions by the Office Action, Torres does not disclose or suggest “a map associating a set of access links with (a) an application object identifier identifying computer executable code comprising a separable portion of a larger executable application; and (b) an organization identifier identifying an organization” as recited in claim 1 of the present claimed invention. Instead, Torres merely describes a knowledge management system that includes indexes for organizing documents in the database. Specifically, Torres states “The term ‘index’ used herein refers to multiple levels of information related to a document or set of documents...One index can point to the all the names of the employees. The ‘names of employees’ index then is a dataset of all the names and points (links) to all the documents where these names can be found” (see Torres, paragraph 0025). Therefore, the index links are only pointers for documents to be related or associated with each other. However, the index links in Torres are NOT an application object identifier identifying computer executable code comprising a separable portion of a larger executable application. Thus, Torres neither discloses nor suggests “a map associating a set of access links with (a) an application object identifier identifying computer executable code comprising a separable portion of a larger executable application; and (b) an organization identifier identifying an organization” as recited in claim 1 of the present claimed invention.

Additionally, Torres fails to disclose or suggest a “link processor for initiating provision of data, the data representing a set of access links, to a user in response to a received organization identifier and a received application object identifiers” that identifies “computer executable code comprising a separable portion of a larger executable application” as in the claimed arrangement. Paragraph 0009, relied on in the rejection, as anticipating the claimed feature merely describes that ability for a user to insert fields for the purpose of indexing the document for a later search. The Torres system does not initiate a provision of data comprising “access links” which provides access to an external document. Furthermore, there is no enabling disclosure in Torres of the present claimed “command processor” which initiates “access to an external document using a link”. Again, Applicant respectfully disagrees with the assertion on

page 4 of the Rejection that this feature is anticipated in paragraph 0009 or 0011 of Torres. Rather, these sections merely facilitate the objective of the Torres system to provide knowledge management by creating an index of documents to be accessed via search at a later time. These index fields described in the cited sections of Torres are NOT equivalent to “an application object identifier identifying **computer executable code comprising a separable portion of a larger executable application**” as in the claimed arrangement. Thus, the claimed invention advantageously enables different users with different security credentials to access only a portion of a larger executable application. “For example, a phlebotomist may have access only to the specimen entry related parts of application 12; a medical technologist may have access to all patient, order and test result entry related parts of the application 12 (Figure 1); and a systems administrator may have access to all parts of the application 12 including 5 administrative reports and system maintenance” (Application, page 7, lines 15 – 25).

Torres is merely directed to a knowledge management system which stores set of documents and manages the documents using database indexes. This is fundamentally different from the present claimed invention which provides a system supporting executable application to access documents external to the application. The system of the present claimed invention enables executable application management and access, via access links, to external data and thereby permits users of the application to access third party files and applications directly from the application. Torres simply is not concerned with providing such features. Therefore, Torres does not disclose or suggest “an executable portion of an executable application, to access documents external to said application” as recited in claim 1 of the present claimed invention.

Dependent claim 2 is considered to be patentable based on its dependence on claim 1. Claim 2 is also considered to be patentable because Torres does not disclose or suggest that the “set of access links supports access to documents from a plurality of different sources external to said application, said map associates said set of access links with a role identifier, the role identifier identifying a particular user performable role; and said link processor automatically initiates provision of data representing a role specific set of access links to a user in response to a received role identifier”. Nowhere is there a mention or suggestion of a role identifier in Torres. The Rejection cites paragraph 0012 in support of the assertion that the claimed feature is anticipated. Applicant respectfully disagrees and submits that paragraph 0012 merely provide for a security system for accessing the documents in the database. There is nothing in Torres that discloses or suggests that a set of access links supporting executable application access to external documents that are linked with “a role identifier...identifying a

particular user performable role” as in the claimed arrangement. Accordingly, there is no 35 USC 112 compliant enabling disclosure that it is or suggests “said map associates said set of access links with a role identifier, the role identifier identifying a particular user performable role; and said link processor automatically initiates provision of data representing a role specific set of access links to a user in response to a received role identifier” as recited in claim 2 of the present claimed invention. Consequently, withdrawal of the rejection of claim 2 under 35 USC 102(e) is respectfully requested.

Dependent claim 3 is considered to be patentable based on its dependence on claim 1. Claim 3 is also considered to be patentable because Torres does not disclose or suggest “said map associates a plurality of sets of access links with (a) a plurality of application object identifiers, the object identifiers identifying a corresponding plurality of different application objects comprising functions including at least one of, (a) patient treatment order entry, (b) specimen data entry, (c) test result data entry, (d) test results inquiry and (e) patient data reporting, and (b) a plurality of organization identifiers, the organization identifiers identifying a corresponding plurality of organizations; and said link processor selects a set of access links from said plurality of sets of access links in response to a received organization identifier and a received application object identifier, the link processor initiating provision of data representing said selected set of access links to a user”. As admitted by the Office Action on page 5, Torres is merely concerned with multilevel indexing for data organization and retrieval. Unlike the present claimed invention, Torres does not show or suggest a “map” that “associates a plurality of sets of access links with (a) a plurality of application object identifiers, the object identifiers identifying a corresponding plurality of application objects comprising functions including at least one of, (a) patient treatment order entry, (b) specimen data entry, (c) test result data entry, (d) test results inquiry and (e) patient data reporting, and (b) a plurality of organization identifiers, the organization identifiers”. As previously explained in connection with claim 1, Torres describes a knowledge management system which stores set of documents and manages the documents using database indexes NOT a set of access links with application object identifier and certainly fails to show or suggest such a feature combination. Consequently, withdrawal of the rejection of claim 3 under 35 USC 102(e) is respectfully requested.

Dependent claim 4 is considered to be patentable based on its dependence on claims 1 and 3 and for reasons given in connection with claims 1 and 3. Claim 4 is also considered to be patentable because Torres fails to disclose or suggest the use of role identifiers in any manner. As discussed above with respect to claim 12, paragraph 0012

makes no mention whatsoever of using any type of “role identifier for any purpose”. Moreover, nothing in paragraph 0025 of Torres, also relied upon in the Rejection, adds any enabling disclosure that “said map associates said plurality of sets of access links with a plurality of role identifiers identifying a corresponding plurality of roles performed by a user; and said link processor selects a set of access links from said plurality of sets of access links in response to a received role identifier, the link processor initiating provision of data representing said selected set of access links to a user” as recited in claim 4 of the present claimed invention. Consequently, withdrawal of the rejection of claim 4 under 35 USC 102(e) is respectfully requested.

Dependent claim 5 is considered to be patentable based on its dependence on claim 1. Consequently, withdrawal of the rejection of claim 5 under 35 USC 102(e) is respectfully requested.

Dependent claim 6 is considered to be patentable based on its dependence on claim 1. Claim 6 is also considered to be patentable because Torres does not disclose or suggest the feature combination in which “an access link comprises at least one of (i) a universal resource locator, (ii) an internet protocol address, (iii) a storage file directory address, (iv) a storage file address, (v) a communication port address, (vi) a server address and (vii) an address for use in locating a document; and a document comprises at least one of (a) a web page, (b) an HTML file, (c) a Word document, (d) an SGML document, (e) an XML document, (f) a multimedia file, (g) an Excel file, (h) a Portable Document Format file, (i) an executable file, (j) a text file and (k) an accessible file”. Contrary to the Rejection statement on page 6, Torres in para. 0008, 0065 and 0067 relied on does not disclose or suggest providing a “set of access links” enabling an “application object” to have “access to documents external to” an “application” in which “an access link comprises at least one of (i) a universal resource locator, (ii) an internet protocol address, (iii) a storage file directory address, (iv) a storage file address, (v) a communication port address, (vi) a server address and (vii) an address for use in locating a document”. There is no such disclosure or suggestion in Torres. Consequently, withdrawal of the rejection of claim 6 under 35 USC 102(e) is respectfully requested.

Dependent claim 7 is considered to be patentable based on its dependence on claim 1. Consequently, withdrawal of the rejection of claim 7 under 35 USC 102(e) is respectfully requested.

Dependent claim 8 is considered to be patentable based on its dependence on claims 1 and 7. Claim 8 is also considered to be patentable because Torres does not disclose or suggest the feature combination of claim 8 in which "said link processor determines an order of display of said access links in said menu window based on at least one of (a) a determined relative importance of individual access links of said set of access links to a role performable by a user, (b) a determined relative importance of access links in said set of access links, (c) alphabetical order, (d) a determined relative importance of access links of said set of access links to an organization and (e) another determined logical order". The Office Action takes Official Notice that ordering method such as alphabetical ordering is well known in the art and used prevalently and such method is capable of instant and unquestionable demonstration as being well known (Office Action, page 7). It is acceptable for official notice to be taken of a fact of "wide notoriety", *In re Howard*, 394 F. 2d 869, 157 USPQ 615, 616 (CCPA 1968) e.g. a fact commonly known to laymen everywhere, 29 AM. Jur 2D Evidence S. 33 (1994) or of a fact that is capable of "instant and unquestionable demonstration", *In re Ahlert* 424 F. 2d 1088, 1091, 165 USPQ 418, 420 (CCPA 1970). However, official notice should not be taken of a fact normally subject to the possibility of rational disagreement among reasonable men, *In re Eynde*, 480 F. 2d 1364, 1370; 178 USPQ 470, 474 (CCPA 1973). It is respectfully submitted that the elements of which the Office Action takes Official Notice, in the context of claim 8, are neither features of "wide notoriety", (*In re Howard*), nor capable of "instant and unquestionable demonstration" (*In re Ahlert*). On the contrary, these features are subject to the possibility of rational disagreement given the claim arrangements within which they reside. Consequently, Applicants take exception to instance of Official Notice used in the rejection. Further, Applicants request that a showing be made of evidence that these features were well known, in the context of claim 8 at the time the invention was made. Consequently withdrawal of the rejection of claim 8 under 35 USC 102(e) is respectfully requested.

Dependent claim 9 is considered to be patentable based on its dependence on claim 1. Claim 9 is also considered to be patentable because Torres does not disclose or suggest the feature combination in which "said command processor initiates access to said external document using a link in said set of access links, the access to the external document being initiated from within said executable application object". As previously discussed with respect to claim 1, the indexing links in Torres are NOT a set of access links provided "to a user in response to a received organization identifier and a received application object identifier" using "a map associating a set of access links with an application object identifier; and an organization identifier identifying an

organization”. Consequently, withdrawal of the rejection of claim 9 under 35 USC 102(e) is respectfully requested.

Dependent claim 10 is considered to be patentable based on its dependence on claims 1 and 9. Claim 10 is also considered to be patentable because Torres does not disclose or suggest the feature combination in which “said command processor initiates access to said external document using a link in said set of access links concurrently with operation of said executable application object”. As previously discussed with respect to claim 1, the indexing links in Torres are NOT a set of access links provided “to a user in response to a received organization identifier and a received application object identifier” using “a map associating a set of access links with an application object identifier; and an organization identifier identifying an organization”. Consequently, withdrawal of the rejection of claim 10 under 35 USC 102 (e) is respectfully requested.

Dependent claim 11 is considered to be patentable based on its dependence on claim 1. Claim 11 is also considered to be patentable because Torres and/or Hazumi does not disclose or suggest the feature combination in which “said application comprises a **laboratory information system** and said external document comprises information concerning at least one of (a) test procedures, (b) chemistry procedures, (c) microbiology procedures, (d) hematology procedures (e) phlebotomy procedures, (f) instrument support, (g) an electronic patient medical record, (h) orders to perform patient procedures, (i) laboratory test results and (j) a patient visit”. Specifically, Torres fails to show or suggest providing a “set of access links” enabling a “**laboratory information system**” “object” to have “access to documents external to” an “application” in combination with use of “a map associating a set of access links with” a “**laboratory information system**” object identifier; and an organization identifier identifying an organization”. Consequently, withdrawal of the rejection of claim 11 under 35 USC 102 (e) is respectfully requested.

Dependent claim 12 is considered to be patentable based on its dependence on claim 1. Claim 12 is also considered to be patentable because Torres does not disclose or suggest the feature combination in which “an access link supports access to a second and different executable application; and said command processor initiates access to said second application”. As previously discussed with respect to claim 1, the indexing links in Torres are NOT a set of access links provided “to a user in response to a received organization identifier and a received application object identifier” using “a map associating a set of access links with an application object identifier; and an

organization identifier identifying an organization”. Consequently, withdrawal of the rejection of claim 12 under 35 USC 102(e) is respectfully requested.

Dependent claim 13 is considered to be patentable based on its dependence on claim 1. Claim 13 is also considered to be patentable because Torres does not disclose or suggest the feature combination in which “said organization identifier comprises a location identifier”. Torres in para. 0026 relied on nowhere suggests using a set of access links provided “to a user in response to a received “location identifier”. Consequently, withdrawal of the rejection of claim 13 under 35 USC 102(e) is respectfully requested.

Independent claim 14 recites “a system enabling a user of an application object, comprising an executable portion of an executable application, to access documents external to said application, comprising: a map associating a set of access links with (a) an application object identifier identifying computer executable code comprising a separable portion of a larger executable application and (b) a role identifier identifying a particular user performable role, said set of access links supporting access by an application to documents external to said application; a link processor for initiating providing data representing a set of access links to a user in response to a received role identifier and a received application object identifier; and a command processor for initiating access to an external document using a link in said set of access links in response to user command”. These features are not shown or suggested in Torres and it is respectfully submits that arguments presented above with respect to claims 1 and 2 are applicable to claim 14 as well.

Specifically, Torres merely describes a knowledge management system that includes indexes for organizing documents in the database. Specifically, Torres states “The term ‘index’ used herein refers to multiple levels of information related to a document or set of documents...One index can point to all the names of the employees. The ‘names of employees’ index then is a dataset of all the names and points (links) to all the documents where these names can be found” (see Torres, paragraph 0025). Therefore, the index links are only pointers for documents to be related or associated with each other. However, the index links in Torres are NOT an application object identifier identifying computer executable code comprising a **separable portion** of a larger executable application. Furthermore, Torres is simply silent on role identifier as required in the present claimed invention. Accordingly, there is no 35 USC 112 compliant enabling disclosure in Torres that suggests a “map associating a set of access links with (a) an application object identifier identifying computer executable code



comprising a separable portion of a larger executable application and (b) a role identifier identifying a particular user performable role, said set of access links supporting access by an application to documents external to said application; a link processor for initiating providing data representing a set of access links to a user in response to a received role identifier and a received application object identifier; and a command processor for initiating access to an external document using a link in said set of access links in response to user command” as recited in claim 14 of the present claimed invention. Consequently, withdrawal of the rejection of claim 14 under 35 USC 102(e) is respectfully requested.

Independent claim 23 recites a “method for enabling a user of an application object, comprising an executable portion of an executable application, to access documents external to said application, comprising the steps of: associating a set of access links with (a) an application object identifier identifying computer executable code comprising a separable portion of a larger executable application and supports an application function, and (b) an organization identifier identifying an organization, said set of access links supporting access to external documents; initiating providing data representing a set of access links to a user in response to a received organization identifier and a received application object identifier; and initiating access to an external document using a link in said set of access links in response to a user command”. It is respectfully submitted that independent claim 23 mirrors independent apparatus claim 1 and is considered to be patentable for similar reasons to claim 1. In addition, nowhere in Torres is there a mention or suggestion of access links associate with individual functions of an executable application. Thus, Torres neither discloses nor suggests “associating a set of access links with (a) an application object identifier identifying computer executable code comprising a separable portion of a larger executable application and supports an application function” as recited in claim 23 of the present claimed invention. Consequently, withdrawal of the rejection of claim 23 under 35 USC 102(e) is respectfully requested.

Independent claim 24 recites a “method for enabling a user of an application object, comprising an executable portion of an executable application, to access documents external to said application, comprising the steps of: associating a set of access links with (a) an application object identifier identifying computer executable code comprising a separable portion of a larger executable application and supports an application function including at least one of, (a) patient treatment order entry, (b) specimen data entry, (c) test result data entry, (d) test results inquiry and (e) patient data reporting, and (b) a role identifier identifying a particular user performable role, said

set of access links supporting access by an application to documents external to said application; initiating providing data representing a set of access links to a user in response to a received role identifier and a received application object identifier; and initiating access to an external document using a link in said set of access links in response to a user command". It is respectfully submitted that independent claim 23 mirrors independent apparatus claim 14 and is considered to be patentable for similar reasons to claim 14. In addition, nowhere in Torres is there a mention or suggestion of access links associate with individual functions of an executable application. Thus, Torres neither discloses nor suggests "associating a set of access links with (a) an application object identifier identifying computer executable code comprising a separable portion of a larger executable application and supports an application function including at least one of, (a) patient treatment order entry, (b) specimen data entry, (c) test result data entry, (d) test results inquiry and (e) patient data reporting" as recited in claim 24 of the present claimed invention. Consequently, withdrawal of the rejection of claim 24 under 35 USC 102(e) is respectfully requested.

In view of the above amendments and remarks, Applicant respectfully submits that Torres does not anticipate the present claimed invention as recited in independent claims 1, 14, 23 and 24. As claims 2 – 13 are dependent on claim 1, it is respectfully submitted that claims 2 – 13 are also allowable for the same reasons discussed above with respect to claim 1. Therefore, it is further respectfully submitted that this rejection has been satisfied and should be withdrawn.

Having fully addressed the Examiner's rejections, it is believed that, in view of the preceding amendments and remarks, this application stands in condition for allowance. Accordingly then, reconsideration and allowance are respectfully solicited. If, however, the Examiner is of the opinion that such action cannot be taken, the Examiner is invited to contact the applicants' attorney at the phone number below, so that a mutually convenient date and time for a telephonic interview may be scheduled.

Respectfully submitted,  
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